

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
CALEA Section 107(c) Petitions)
Receiving Preliminary Extensions)
From the Common Carrier Bureau)

CC Docket No. 97-213
NSD-L-00-254
RECEIVED

JAN - 4 2001

TO: Common Carrier Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**REPLY COMMENTS
AND REQUEST FOR CORRECTION OF APPENDIX**

Big Bend Telephone Company, Inc. ("Big Bend"), Cameron Long Distance ("Cameron"), Electra Telephone Company ("Electra"), Haviland Telephone Co., Inc. ("Haviland"), Haxtun Telephone Company ("Haxtun"), McCook Cooperative Telephone Company ("McCook"), MoKan Dial, Inc. ("MoKan"), St. John Cooperative Telephone and Telegraph Company ("St. John"), Tatum Telephone Company ("Tatum"), TXU Communications ("TXU") and Walnut Hill Telephone Company ("Walnut Hill") hereby submit their Reply Comments in response to the Public Notice (CALEA Section 107(c) Extension Petitions Receiving Preliminary Extensions From The Common Carrier Bureau), DA 00-2582, released November 20, 2000 ("Public Notice").

While searching to determine whether any party had filed comments opposing their requests for Section 107(c) extensions, Big Bend, Cameron, Electra, Haviland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill found that their names had been omitted from the Appendix (Carriers Receiving Preliminary Extensions until March 31, 2001 to Comply with CALEA Section 103 Requirements) to the Public Notice. Big Bend, Cameron, Electra, Haviland, Haxtun, McCook, MoKan, St. John,

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Tatum, TXU and Walnut Hill filed a timely, complete and sufficient Category B petition for Section 107(c) extensions on May 31, 2000, and believe that the omissions of their names from the Appendix are the result of inadvertent clerical errors.

Big Bend, Cameron, Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill request that the Appendix be corrected or supplemented to include their names. They request further that the Bureau take the steps necessary to allow law enforcement officials to verify that they have requested Section 107(c) extensions, and to ensure that final determinations will be issued at a future date with respect to their requests for full extensions beyond the initial preliminary extensions.

On May 31, 2000, Big Bend, Cameron, Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill participated with one other carrier, Midvale Telephone Exchange, Inc. ("Midvale") in the filing with the Commission of a Joint Petition For Extension of the capability requirements of Section 103 of the Communications Assistance for Law Enforcement Act ("CALEA"). A copy of the text of this petition, showing that it was stamped "RECEIVED" by the Office of the Secretary on May 31, 2000, is attached. Also attached are copies of the letters from the FBI's CALEA Implementation Section to Big Bend, Cameron, Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill, indicating that they have participated in the FBI's Flexible Deployment Assistance Program. Subsequent FBI letters supporting their requests for extension of the CALEA capability requirements were received (and filed with the Commission as supplements) by several of the parties, including Big Bend, Electra, Havilland, Haxtun, McCook, MoKan, Tatum and Walnut Hill.

Page 4 of the Appendix contains no reference to Big Bend, nor any entity with a similar name. Big Bend is located in Alpine, Texas, and has been assigned TRS Number 806943.

Page 5 of the Appendix contains no reference to Cameron, nor any entity with a similar name. Cameron is located in Sulphur, Louisiana, and has been assigned TRS Number 801180.

Page 11 of the Appendix contains no reference to Electra, nor any entity with a similar name. Electra is located in Lewisville, Arkansas, and has been assigned TRS Number 801705.

Page 14 of the Appendix contains no reference to Havilland, nor any entity with a similar name. Havilland is located in Havilland, Kansas, and has been assigned TRS Number 802089.

Page 14 of the Appendix also contains no reference to Haxtun, nor any entity with a similar name. Haxtun is located in Lewisville, Arkansas, and has been assigned TRS Number 802497.

Page 14 of the Appendix contains a reference to McCook Telecom (which operates an exchange in Salem, South Dakota), but not to its parent company McCook (which operates exchanges in Center, Winfred, Canova and Spencer, South Dakota). Both companies contribute to the Telecommunications Relay Service Fund under TRS Number 802125. However, they serve different exchanges, and participated in different joint petitions.

Page 19 of the Appendix contains no reference to MoKan, nor any entity with a similar name. MoKan is located in Louisburg, Kansas, and has been assigned TRS Number 808041.

Pages 25 and 26 of the Appendix contain no reference to St. John, nor any entity with a similar name. St. John is located in St. John, Washington, and has been assigned TRS Number 804105.

Page 27 of the Appendix contains no reference to Tatum, nor any entity with a similar name. Tatum is located in Lewisville, Arkansas, and has been assigned TRS Number 801702.

Page 28 of the Appendix contains no reference to TXU, nor any entity with a similar name. TXU is located in Lufkin, Texas, and has been assigned TRS Number 801645.

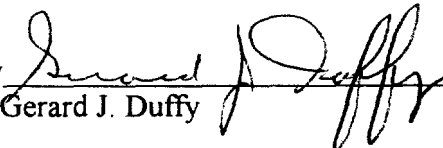
Pages 29 and 30 of the Appendix contain no reference to Walnut Hill. They refer to a carrier named "Walnut Telephone Company" under TRS Number 809650, but this is an unrelated carrier located in Walnut, Iowa. Walnut Hill is located in Lewisville, Arkansas, and has been assigned TRS Number 802509.

Big Bend, Cameron, Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill have participated in the FBI's Flexible Deployment Assistance Program, and have received and submitted FBI letters acknowledging their participation. They have also participated in the filing of a timely Section 107(c) petition with the Bureau, and have submitted all of the information requested by the Commission. The other local exchange carrier participating in the same Joint Petition -- Midvale -- is listed in the Appendix. Therefore, it appears that the omission of Big Bend, Cameron,

Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill from the Appendix was an inadvertent clerical error.

Big Bend, Cameron, Electra, Havilland, Haxtun, McCook, MoKan, St. John, Tatum, TXU and Walnut Hill request that the Appendix be corrected or supplemented to include their names. They also request that the Bureau take the steps necessary to allow law enforcement officials to verify that they have requested Section 107(c) extensions. Finally, they request that the Bureau include them in the final determinations that it will issue at a future date with respect to their requests for full extensions beyond the preliminary March 31, 2001 date.

Respectfully submitted,
Big Bend Telephone Company, Inc.
Cameron Long Distance
Electra Telephone Company
Haviland Telephone Co., Inc.
Haxtun Telephone Company
McCook Cooperative Telephone Company
MoKan Dial, Inc.
St. John Cooperative Telephone and Telegraph
Company
Tatum Telephone Company
TXU Communications
Walnut Hill Telephone Company

By 
Gerard J. Duffy

Their Attorney

Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
2120 L Street, NW, Suite 300
Washington, DC 20037
(202) 659-0830

Dated: January 4, 2001

RECEIPT

5000

Before the
Federal Communications Commission
Washington, D.C.

RECEIVED
MAY 31 2000
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of:
The Communications Assistance
For Law Enforcement Act (CALEA),
Section 107(c) Extensions of Capability Requirements
Regarding Nortel, Siemens, Redcom and Harris Switches

Big Bend Telephone Company, Inc. (TRS No. 806943)
Cameron Long Distance (TRS No. 801180)
Electra Telephone Company (TRS No. 801705)
Haviland Telephone Co., Inc. (TRS No. 802089)
Haxtun Telephone Company (TRS No. 802497)
McCook Cooperative Telephone Company (TRS No. 802125)
Midvale Telephone Exchange, Inc. (TRS No. 803679)
MoKan Dial, Inc. (TRS No. 808041)
St. John Cooperative Telephone and Telegraph Company (TRS No. 804105)
Tatum Telephone Company (TRS No. 801702)
TXU Communications (TRS No. 801645)
Walnut Hill Telephone Company (TRS No. 802509)

TO: Common Carrier Bureau

JOINT PETITION FOR EXTENSION

1. Big Bend Telephone Company, Inc. ("Big Bend"), Cameron Long Distance ("Cameron"), Electra Telephone Company ("Electra"), Haviland Telephone Co., Inc. ("Haviland"), Haxtun Telephone Company ("Haxtun"), McCook Cooperative Telephone Company ("McCook"), Midvale Telephone Exchange, Inc. ("Midvale"), MoKan Dial, Inc. ("MoKan"), St. John Cooperative Telephone and Telegraph Company ("St. John"), Tatum Telephone Company ("Tatum"), TXU Communications ("TXU") and Walnut Hill Telephone Company ("Walnut Hill") (hereinafter collectively "Petitioners") hereby request extensions until as long as June 30, 2002, of the CALEA Section 103 capability requirements, 47 U.S.C. §1002, pursuant to CALEA Section 107(c), 47 U.S.C. §1006(c).

2. The switches of several of the Petitioners were installed and deployed before January 1, 1995. The Federal Bureau of Investigation ("FBI") has not yet completed its rulemaking defining the term "replaced or significantly upgraded or otherwise undergoes major modification" in CALEA Section 109(d), 47 U.S.C. §1008(d), Implementation of Section 109 of the Communications Assistance for Law Enforcement Act, 61 Fed. Reg. 58799 (Nov. 19, 1996). Until this term is defined, it is not clear whether pre-1/1/95 switches are subject to any CALEA capability compliance obligations unless and until the Attorney General agrees to pay for all reasonable costs directly associated with modifications under CALEA Sections 109(a) and (d). Ten of the twelve Petitioners have had no electronic surveillance requests from law enforcement regarding felony criminal investigations for more than four years, while Big Bend (three) and TXU (six) have had only a minimal number of such requests. All of the Petitioners (except Cameron, which is the long distance affiliate of rural telephone companies) are rural telephone companies that cannot reasonably afford to devote substantial resources of their own to CALEA-related switch upgrades at this time. Moreover, the equipment and software necessary to bring the switches of the Petitioners into compliance with the CALEA capability requirements cannot be acquired and received by Petitioners from their vendors (much less be installed and tested in a prudent and satisfactory manner) in sufficient time to be operational by June 30, 2000. To the best of the information and belief of Petitioners, the requisite equipment and software is not presently available. Even when it becomes available, the FBI and the equipment are not likely to give high priority to the delivery, installation and testing of CALEA-related software and associated equipment in low-crime, rural areas like those served by Petitioners. Hence, compliance with the Section 103 capability requirements is not reasonably achievable through the application of technology available within the existing compliance period.

3. Petitioners request extensions for the equipment, facilities and services listed in Attachment A (marked "Confidential – Not for Public Disclosure"), as stated therein.

4. Petitioners are filing a Category B petition, and are attaching (Attachment B) the following information to support their petition for an extension under CALEA Section 107(c): letters to each Petitioner from the FBI's Flexible Deployment Program that contain confirmations from the FBI that the petitioning carrier filed information with the FBI's Flexible Deployment Program.

5. Undersigned counsel and the following employees or officers of Petitioners are authorized to discuss CALEA-related matters with the Commission:

Big Bend:

Bruce Wood
808 North Fifth Street
Alpine, TX 79830
PH (915) 364-1000
FX (915) 364-0023
EM bruce_wood@bbtco.com

Cameron:

Ginny LeBoeuf
153 Dave Dugas Road
Sulphur, LA 70663
PH: (337) 583-2111
FX: (337) 583-2063
EM: ginny@camtel.net

Electra, Haxtun, Tatum & Walnut Hill

Steven J Price
105 Garrett Street
Lewisville, AR 71845
PH (870) 921-5460
FX (870) 921-3291
EM sjp@townes.net

Haviland:

Mark Wade
106 North Main Street
Haviland, KS 67059
PH (316) 862-5211
FX (316) 862-5204
EM: mark@havilandtelco.com

McCook:

Bryan K Roth
330 South Nebraska
Salem, SD 57058
PH (605) 425-2238
FX (605) 425-2712
EM bkroth@triorel.net

Midvale:

John Stuart
2205 Keithley Creek Road
Midvale, ID 83645
PH (208) 355-2211
FX (208) 355-2222
EM: john@ruralnetwork.net

MoKan:

Donald D. Stowell
112 South Broadway
Louisburg, KS 66053
PH: (913) 837-2219
FX: (913) 837-5108
EM: dds@townes.net

St. John:

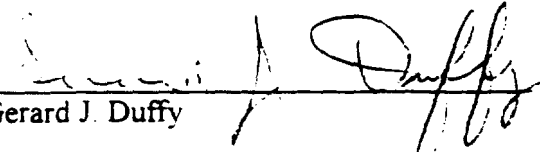
Larry L. Dickerson
East 11 Front Street
St. John, WA 99171
PH: (509) 648-3322
FX: (509) 648-9900
EM: Not available

TXU:

Kathy Yeager
321 North First Street
Lufkin, TX 75902
PH: (409) 634-8861
FX: (409) 637-2591
EM: kathy.yeager@txucom.com

WHEREFORE, the above premises and information considered, it is respectfully requested that the requested extension be granted.

Respectfully submitted,
Big Bend Telephone Company, Inc.
Cameron Long Distance
Electra Telephone Company
Haviland Telephone Co., Inc.
Haxtun Telephone Company
McCook Cooperative Telephone Company
Midvale Telephone Exchange, Inc.
MoKan Dial, Inc.
St. John Cooperative Telephone and Telegraph Company
Tatum Telephone Company
TXU Communications
Walnut Hill Telephone Company.

By 
Gerard J. Duffy

Their Attorney

Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W. (Suite 300)
Washington, DC 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568
E-mail gjd@bmjd.com

Dated May 30, 2000



U.S. Department of Justice

Federal Bureau of Investigation

CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151

May 10, 2000

Bruce Wood
Big Bend Telephone Co., Inc.
808 North 5th St.
Alpine, TX 79830

FCCTRS # 806943
ID #949

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on April 3, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "Catherine Kudrick", is positioned above the typed name.

Catherine Kudrick
Program Manager
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens

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Exhibit B



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 6, 2000

Ginny LeBoeuf
Cameron Long Distance
P.O.Box 167
Sulphur, LA 70664-0167

FCCTRS # 801180
ID #660

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "Rozanne R. Worrell".

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Steve J. Price
Electra Telephone Company
P.O. Box 729, Hwy. 82 & 29
Lewisville, AR 71845

FCCTRS # 801705
ID #594

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "Rozanne R. Worrell".

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 6, 2000

Mark A. Wade
Haviland Telephone Co., Inc.
106 N. Main, P.O. Box 308
Haviland, KS 67059-0308

FCCTRS # 802089
ID #668

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on April 4, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "Rozanne R. Worrell", is written over a horizontal line.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Steve J. Price
Haxtun Telephone Company
P.O. Box 729, Hwy. 82 & 29
Lewisville, AR 71845

FCCTRS # 802497
ID #587

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Rozanne R. Worrell".

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

March 9, 2000

Ray Oyen
McCook Cooperative Telephone Company
330 South Nebraska Street
P.O. Box 630
Salem, SD 57058

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 8, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

Rozanne R. Worrell

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: John M. De Witte
Martin & Associates



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Donald D. Stowell
MoKan Dial, Inc.
P.O. Box 429, 112 S. Broadway
Louisburg, KS 66053-0429

FCCTRS # 808041
ID #589

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, reading "Rozanne R. Worrell". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerad J. Duffy
Blooston, Mordkofsky, Jackson & Dickens



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Larry L. Dickerson
St. John Cooperative Telephone and Telegraph Company
P.O. Box 268
St. John, WA 99171

FCCTRS # 804105
ID #612

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on April 3, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, reading "Rozanne R. Worrell", is positioned above the typed name.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens

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U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Steve J. Price
Tatum Telephone Company
P.O. Box 729, Hwy. 82 & 29
Lewisville, AR 71845

FCCTRS # 801702
ID #593

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, reading "Rozanne R. Worrell", is positioned above the typed name.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Mario Danna
TXU Communications
321 N. First St., P.O. Box 151420
Lufkin, TX 75915-1420

FCCTRS # 801645
ID #590

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "Rozanne R. Worrell", is written over a horizontal line.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens



U.S. Department of Justice

Federal Bureau of Investigation

*CALEA Implementation Section
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151*

April 5, 2000

Steve J. Price
Walnut Hill Telephone Company
P.O. Box 729, Hwy. 82 & 29
Lewisville, AR 71845

FCCTRS # 802509
ID #588

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials you submitted in response to the Flexible Deployment Assistance Guide on March 31, 2000. Your materials are currently under review. CIS will contact you if we have any questions or concerns regarding your submission as it is being reviewed. CIS will also provide you with a written decision regarding your proposed deployment schedule.

Thank you for your submission. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, reading "Rozanne R. Worrell". The signature is fluid and cursive, with the first name "Rozanne" being the most prominent part.

Rozanne R. Worrell
Supervisory Special Agent
Flexible Deployment

cc: Gerad J. Duffy
Blooston, Mordkofsky, Jackson & Dickens